Case 8-22-72048-las Doc 70-1 Filed 12/05/22 Entered 12/05/22 14:49:56

UNITED STATES BANKRUPTCY COUR' EASTERN DISTRICT OF NEW YORK	Т
In re:	x Chapter 11
Broadbridge LA LLC,	Case No. 22-72048-LAS
Debtor	
X	

NOTICE OF DEBTOR'S TERMINATION OF CONTRACT OF SALE FOR PREMISES AT 801 SOUTH BROADWAY, LOS ANGELES, CA, WITHDRAWAL OF ITS LIQUIDATING PLAN OF REORGANIZATION, AND CONSENT TO DISMISSAL OF THE CHAPTER 11 CASE

PLEASE TAKE NOTICE that after multiple opportunities to fund the deposit, and despite repeated assurances that the deposit would be forthcoming which never occurred, Broadbridge LA LLC (the "Debtor"), has elected to terminate the Contract of Sale with Capri Investor LLC or its designee ("Capri") for the sale of the Debtor's real property located at 801 South Broadway, Los Angeles, California.

PLEASE TAKE FURTHER NOTICE that in light of the termination of the Contract of Sale, the Debtor hereby withdraws its liquidating plan of reorganization and consents to the entry of the attached Order or such other Order as the Court deems appropriate.

Dated: New York, New York December 5, 2022

> GOLDBERG WEPRIN FINKEL GOLDSTEIN LLP Counsel for the Debtor 1501 Broadway, 22nd Floor New York, NY 10036 (212) 221-5700

By: /s/ Kevin J. Nash, Esq

Dated: San Francisco, California December 5, 2022

> DUANE MORRIS LLP Counsel for the Museum Building Holdings LLC One Market, Spear Tower, Suite 2200 San Francisco, CA 94105 (415) 957-3000

By: /s/ Meagen E. Leary, Esq

Dated: Chicago, Illinois December 5, 2022

> DUANE MORRIS LLP Counsel for the Museum Building Holdings LLC 190 S. LaSalle, Suite 3700 Chicago, IL 60603 (312) 499-6700

By: /s/ Paul E. Chronis, Esq

To: All counsel (Via ECF)